

Message

From: Aldridge, Amanda [Aldridge.Amanda@epa.gov]
Sent: 2/21/2020 7:54:38 PM
To: Sanchez, Rafael [Sanchez.Rafael@epa.gov]; John Ackerly [jackerly@forgreenheat.org]
CC: Scinta, Robert [scinta.robert@epa.gov]; Yellin, Patrick [Yellin.Patrick@epa.gov]
Subject: RE: is it OK to advertise using stove with door open?

John - I also note these things in the NSPS:

John: I find these things regarding operation:

532(g) says user must operate consistent with owner's manual and that the owner's manual must clearly specify that operation in a manner inconsistent with the owner's manual would void the warranty. ;

536(g) lists the owner's manual requirements;

538(e) operate consistent with owner's manual and label.

There is also Appendix I which gives a details about what should be in the owner's manual such as: 2.3.2 Tamper Warnings . . . It is against federal regulations to operate wood heater in a manner inconsistent with operating instructions; Also 2.3.3 Overall Heater Warranty Information and Catalyst Information and Warranty

And regarding wet wood,

60.531 is the definition of: unseasoned wood means wood with an average moisture content of 20% or more

60.532(f)(12) lists unseasoned wood as a prohibited fuel type

Amanda

From: Sanchez, Rafael <Sanchez.Rafael@epa.gov>
Sent: Friday, February 21, 2020 2:50 PM
To: John Ackerly <jackerly@forgreenheat.org>; Aldridge, Amanda <Aldridge.Amanda@epa.gov>
Cc: Scinta, Robert <scinta.robert@epa.gov>; Yellin, Patrick <Yellin.Patrick@epa.gov>
Subject: RE: is it OK to advertise using stove with door open?

Hi John

In the US, a heater must be tested the same way as intended and used by the customer. As Amanda alluded to, some manufacturers promote their heaters with an optional viewing screen. This screen is designed to be used with the heater's door open. Manufacturers are promoting this optional use in places where there aren't environmental restrictions, such as some providences in Canada. Recently, a manufacturer requested EPA to review the use of language to that effect in their manuals. The proposed language is something like ...this product cannot be used with the door open where strict regulations are impletemted.

I called Jotul and left a message to inquire about the heater you have mentioned. I'll keep you posted.

Rafael Sanchez

From: John Ackerly <jackerly@forgreenheat.org>
Sent: Friday, February 21, 2020 11:31 AM
To: Aldridge, Amanda <Aldridge.Amanda@epa.gov>

Cc: Sanchez, Rafael <Sanchez.Rafael@epa.gov>

Subject: Re: is it OK to advertise using stove with door open?

Thanks Amanda, but I thought surely there is something in the NSPS that prevents a device from being used in radically different ways than it was tested. Technically, the NSPS even says you can't burn wet wood in stoves, doesn't it? If you can advertise using the stove in ways it wasn't tested, then can you advertise that you don't really need to have a catalyst in a catalytic stove? Or that its OK to alter the air supply, or any number of other ways that consumers are known to use and alter their stoves?

John

On Fri, Feb 21, 2020 at 11:09 AM Aldridge, Amanda <Aldridge.Amanda@epa.gov> wrote:

I think you are referring to this language: POPULAR OPTIONS INCLUDE: SCREEN FOR OPEN DOOR FIRE VIEWING,

We just recently discussed this topic and acknowledged that some models are sold in areas that do not have regulations that require testing with the door open and closed to be able to allow this. We discussed that perhaps a statement in the owner's manual should state where and how this is allowed.

I will let Rafael follow up, as I do not know if management has approved the wording of this final statement

From: John Ackerly <jackerly@forgreenheat.org>

Sent: Friday, February 21, 2020 10:16 AM

To: Sanchez, Rafael <Sanchez.Rafael@epa.gov>; Aldridge, Amanda <Aldridge.Amanda@epa.gov>

Subject: Re: is it OK to advertise using stove with door open?

Just wanted to make sure you got this email. Amanda - do you have an opinion on this?

John

On Wed, Feb 12, 2020 at 4:57 PM John Ackerly <jackerly@forgreenheat.org> wrote:

Dear Rafael and Amanda,

I may have raised this question years ago, but I'm curious if its allowed to advertise that the stove can be used with the door open. Seems like that would be a real violation, unless the stove is also tested that way and can meet emission standards. Here is how Jotul advertises a number of their stoves. Screen shot attached.

"OPTIONS INCLUDE: SCREEN FOR OPEN DOOR FIRE VIEWING"

John

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